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December 5, 2024

BY ECF ONLY

Honorable Karen Gren Scholer
U.S. District Judge
1100 Commerce Street, Room 1654
Dallas, TX 75242

Re: *Goodman Networks, Inc. Bankruptcy Case Related Adversary Proceeding Motions to Withdraw the Reference*

Dear Judge Scholer:

Your Honor will recall that I am lead counsel for Scott M. Seidel, the Trustee for Goodman Networks, Inc., and the plaintiff in a series of Adversary Proceedings filed in connection with this bankruptcy case. At the October 9, 2024 hearing on a motion to withdraw the reference in Civil Proceeding No. 3:24-cv-02268-S, the Court requested that I inform her of any other adversary proceeding pending before the Bankruptcy Court (Judge Michelle V. Larson) where a motion for withdrawal of the reference has been filed and assigned as a civil proceeding to a different judge in this Court.

Such a motion has been filed in Bankruptcy Court Adversary Proceeding No. 23-03090 and assigned to Judge Fitzwater, in Civil Proceeding No. 3:24-cv-03000-D, *Seidel v. Hudson Clean Energy Enterprises, LLC, et. al.*

A separate motion filed by a separate defendant, but also in the same Adversary Proceeding, has been assigned to Judge Starr as Civil Proceeding No. 3:24-cv-02936-X.

Yet a third proceeding initiated by a motion to withdraw the reference in the same Adversary Proceeding has been assigned to Judge Starr as Civil Proceeding No. 3:24-cv-02931-X.

As I understood from Your Honor at said status conference, the Court was going to transfer all Goodman-related motions to withdraw the reference to herself for consideration, which the Trustee certainly has no objection to. I would also suggest consolidating these three District Court proceedings into one, since they all arise from the same issue in the same underlying Adversary Proceeding.

Sincerely,

/s/ Davor Rukavina
Davor Rukavina, Esq.

DR:

cc [by CM/ECF only]:

Honorable Sidney A Fitzwater
Honorable Brantley Starr
Leslie Sara Hyman, Esq.
Paul Elkins, Esq.
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